

PRIVACY AND PERSONAL DATA PROCESSING POLICY

of ProfitProekt-Plus LLC

1. General Provisions

1.1. This Policy regarding the processing of personal data (hereinafter - the "Policy") is drafted in accordance with Clause 2, Article 18.1 of the Federal Law "On Personal Data" No. 152-FZ dated July 27, 2006, as well as other regulatory legal acts of the Russian Federation in the field of protection and processing of personal data and applies to all personal data (hereinafter - "Data") that the Organization (hereinafter - the "Operator", the "Company") may obtain from a subject of personal data who is a party to a civil law contract, from an Internet user (hereinafter - the "User") while using any of the websites, services, programs, products, or services of ProfitProekt-Plus LLC, as well as from a subject of personal data who is in a relationship with the Operator governed by labor legislation (hereinafter - the "Employee").

1.2. The Operator ensures the protection of processed personal data from unauthorized access and disclosure, unlawful use, or loss in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.

1.3. The Operator has the right to make changes to this Policy. When changes are made, the title of the Policy indicates the date of the last update of the version. The new version of the Policy comes into force from the moment it is posted on the website, unless otherwise provided by the new version of the Policy.

2. Terms and Accepted Abbreviations

Personal Data - any information relating to a directly or indirectly identified or identifiable individual (subject of personal data).

Processing of Personal Data - any action (operation) or a set of actions (operations) performed with personal data, with or without the use of automation tools, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Automated Processing of Personal Data - processing of personal data by means of computer technology.

Personal Data Information System (PDIS) - a set of personal data contained in databases and information technologies and technical means ensuring their processing.

Personal Data Made Public by the Subject of Personal Data - personal data to which access by an unlimited number of persons has been granted by the subject of personal data or at his/her request.

Blocking of Personal Data - temporary cessation of processing of personal data (except for cases where processing is necessary to clarify personal data).

Destruction of Personal Data - actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or which result in the destruction of tangible media of personal data.

Operator - an organization that, independently or jointly with other persons, organizes the processing of personal data, as well as determines the purposes of processing personal data subject to processing, the actions (operations) performed with personal data. The Operator is ProfitProekt-Plus LLC, located at: 111250, Moscow, Proezd Zavoda "Serp i Molot", d.6, stroenie 1.

3. Processing of Personal Data

3.1. Obtaining Personal Data.

3.1.1. All personal data must be obtained from the subject himself/herself. If the personal data of a subject can only be obtained from a third party, the subject must be notified of this or his/her consent must be obtained.

3.1.2. The Operator must inform the subject about the purposes, intended sources, and methods of obtaining personal data, the nature of the personal data to be obtained, the list of actions with personal data, the period for which the consent is valid, and the procedure for its withdrawal, as well as the consequences of the subject's refusal to give written consent to their receipt.

3.1.3. Documents containing personal data are created by:

- copying original documents (passport, education document, TIN certificate, pension certificate, etc.);
- entering information into registration forms;
- obtaining originals of necessary documents (work record book, medical report, reference, etc.).

3.2. Processing of Personal Data.

3.2.1. Processing of personal data is carried out:

- with the consent of the subject of personal data to the processing of his/her personal data;
- in cases where the processing of personal data is necessary for the exercise and performance of functions, powers, and duties imposed by the legislation of the Russian Federation;
- in cases where personal data is processed, access to which has been provided by the subject of personal data or at his/her request to an unlimited number of persons (hereinafter - personal data made public by the subject of personal data).

3.2.2. Purposes of processing personal data:

- execution of labor relations;
- execution of civil law relations;
- for communication with the user in connection with filling out the feedback form on the website, including sending notifications, requests, and information related to the use of the online store website, processing, coordinating orders and their delivery, execution of agreements and contracts;
- depersonalization of personal data to obtain anonymized statistical data, which is transferred to a third party for conducting research, performing works, or rendering services on behalf of the store.

3.2.3. Categories of subjects of personal data.

Personal data of the following subjects of personal data are processed:

- individuals in employment relationships with the Company;
- individuals who have resigned from the Company;
- individuals who are job candidates;
- individuals in civil law relationships with the Company;
- individuals who are Users of the Online Store Website.

3.2.4. Personal data processed by the Operator:

- data obtained in the course of employment relationships;
- data obtained for the purpose of selecting job candidates;
- data obtained in the course of civil law relationships;
- data obtained from Users of the Online Store Website.

3.2.5. Processing of personal data is conducted:

- using automation means;
- without the use of automation means.

3.3. Storage of Personal Data.

3.3.1. Personal data of subjects may be obtained, undergo further processing, and be transferred for storage both on paper and in electronic form.

3.3.2. Personal data recorded on paper media are stored in locked cabinets or in locked premises with limited access rights.

3.3.3. Personal data of subjects processed using automation means for different purposes are stored in different folders.

3.3.4. It is not permitted to store and place documents containing personal data in open electronic directories (file shares) in the PDIS.

3.3.5. Storage of personal data in a form that allows identification of the subject of personal data is carried out no longer than required by the purposes of their processing, and they are subject to destruction upon achievement of the processing purposes or in case of loss of necessity for achieving them.

3.4. Destruction of Personal Data.

3.4.1. Destruction of documents (media) containing personal data is carried out by burning, shredding (grinding), chemical decomposition, turning into a shapeless mass or powder. For the destruction of paper documents, the use of a shredder is permitted.

3.4.2. Personal data on electronic media are destroyed by erasing or formatting the media.

3.4.3. The fact of destruction of personal data is documented by a certificate of destruction of media.

3.5. Transfer of Personal Data.

3.5.1. The Operator transfers personal data to third parties in the following cases:

- the subject has expressed his/her consent to such actions;
- the transfer is provided for by Russian or other applicable legislation within the framework of the procedure established by law.

3.5.2. List of persons to whom personal data are transferred.

- Pension Fund of the Russian Federation for accounting (on legal grounds);
- Tax authorities of the Russian Federation (on legal grounds);
- Social Insurance Fund of the Russian Federation (on legal grounds);
- Territorial Fund of Compulsory Medical Insurance (on legal grounds);
- Medical insurance organizations for compulsory and voluntary medical insurance (on legal grounds);
- Banks for payroll calculation (under an agreement);
- Ministry of Internal Affairs of Russia bodies in cases stipulated by law;
- Anonymized personal data of Users of the online store website are transferred to the Store's counterparties.

4. Protection of Personal Data

4.1. In accordance with the requirements of regulatory documents, the Operator has created a personal data protection system (PDPS), consisting of subsystems of legal, organizational, and technical protection.

4.2. The legal protection subsystem is a set of legal, organizational, administrative, and regulatory documents ensuring the creation, functioning, and improvement of the PDPS.

4.3. The organizational protection subsystem includes the organization of the PDPS management structure, a permission system, and information protection when working with employees, partners, and third parties.

4.4. The technical protection subsystem includes a set of technical, software, and hardware-software tools ensuring the protection of personal data.

4.5. The main measures for the protection of personal data used by the Operator are:

4.5.1. Appointment of a person responsible for the processing of personal data, who organizes the processing of personal data, training and instruction, and internal control over the compliance of the institution and its employees with the requirements for the protection of personal data.

4.5.2. Identification of current threats to the security of personal data during their processing in the PDIS and development of measures and activities for the protection of personal data.

4.5.3. Development of a policy regarding the processing of personal data.

4.5.4. Establishment of rules for access to personal data processed in the PDIS, as well as ensuring registration and accounting of all actions performed with personal data in the PDIS.

4.5.5. Establishment of individual access passwords for employees to the information system in accordance with their job duties.

4.5.6. Application of information security tools that have undergone the conformity assessment procedure in the established manner.

4.5.7. Certified antivirus software with regularly updated databases.

4.5.8. Compliance with conditions ensuring the safety of personal data and preventing unauthorized access to them.

4.5.9. Detection of facts of unauthorized access to personal data and taking measures.

4.5.10. Restoration of personal data modified or destroyed due to unauthorized access to them.

4.5.11. Training of the Operator's employees directly involved in the processing of personal data on the provisions of the Russian legislation on personal data, including requirements for the protection of personal data, documents defining the Operator's policy regarding the processing of personal data, and local acts on the processing of personal data.

4.5.12. Conducting internal control and audit.

5. Basic Rights of the Subject of Personal Data and Obligations of the Operator

5.1. Basic Rights of the Subject of Personal Data.

The subject has the right to access his/her personal data and the following information:

- confirmation of the fact of processing of personal data by the Operator;
- legal grounds and purposes of processing personal data;
- purposes and methods of processing personal data applied by the Operator;
- name and location of the Operator, information about persons (except for the Operator's employees) who have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the Operator or on the basis of federal law;
- terms of processing of personal data, including their storage periods;
- procedure for the exercise by the subject of personal data of the rights provided for by the Federal Law;
- name or surname, first name, patronymic, and address of the person processing personal data on behalf of the Operator, if processing is or will be entrusted to such a person;
- applying to the Operator and sending requests to him;
- appealing against the actions or inaction of the Operator.

5.2. Obligations of the Operator.

The Operator is obliged:

- when collecting personal data, to provide information on the processing of personal data;
- in cases where personal data were not obtained from the subject of personal data, to notify the subject;
- in case of refusal to provide personal data, to explain to the subject the consequences of such refusal;
- to publish or otherwise provide unrestricted access to the document defining its policy regarding the processing of personal data, to information on the implemented requirements for the protection of personal data;
- to take necessary legal, organizational, and technical measures or ensure their adoption to protect personal data from unlawful or accidental access to them, destruction, modification, blocking,

copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;

- to provide responses to requests and appeals from subjects of personal data, their representatives, and the authorized body for the protection of the rights of subjects of personal data.